



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

July 28, 2003

Certified Mail No. 7099 3220 0009 1976 2231

Fred Hutchison
Director, EHS
University of Idaho
1108 W. Sixth St.
Moscow, ID 83844-2030

RE: AIRS Facility No. 057-00025, University of Idaho, Moscow
Final Amended Tier I Operating Permit

Dear Mr. Hutchison:

The Department of Environmental Quality (Department) is issuing amended Tier I Operating Permit No. T1-020208 to the University of Idaho in accordance with IDAPA 58.01.01.300 - 386. The enclosed permit is effective immediately and is based on the information contained in your administrative amendment application, received November 27, 2002.

Eric Kopczynski of the Lewiston Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Dan Salgado at (208) 373-0502 or dsalgado@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,

C. Stephen Allred
Director
Department of Environmental Quality

CSA/HE\sd

Project No. T1-020208

Enclosures

cc: Sherry Davis, Air Quality Division
Eric Kopczynski, Lewiston Regional Office
Laurie Kral, EPA Region 10
Harbi Elshafei, Permit Writer
Dan Salgado, Permit Coordinator
Pat Rayne, AFS
Marilyn Seymore, PF
Joan Lechtenberg, Public Comment
Phyllis Heitman, (Ltr Only)
Reading File, Ltr Only)



**Air Quality
TIER I OPERATING PERMIT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO. T1-020208

AIRS Facility No. 057-00025

AQCR: 62

CLASS: A

SIC: 8221

ZONE: 11

UTM COORDINATE (km): 499.0, 5175.0

1. PERMITTEE

University of Idaho

2. PROJECT

Tier I operating permit (Amended)

3. MAILING ADDRESS

1108 W. Sixth St.

CITY

Moscow

STATE

ID

ZIP

83844-2030

4. FACILITY CONTACT

Fred Hutchison

TITLE

Director, EHS

TELEPHONE

(208) 885-6524

5. RESPONSIBLE OFFICIAL

Jerry N. Wallace

TITLE Vice President

Finance and Administration

TELEPHONE

(208) 885-6174

6. EXACT PLANT LOCATION

West side of the city of Moscow

COUNTY

Latah

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Graduate and post-graduate education and research

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300-386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to State-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page. Please be aware this permit replaces Tier I Operating Permit No. 057-00025, dated November 18, 2002, the terms and conditions of which shall no longer be in effect.

**S. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: July 28, 2003

DATE EXPIRES November 18, 2007

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society of Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
COMS	continuous opacity monitoring system
Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain
gr/dscf	grains per dry standard cubic foot
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb	pound(s)
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
MMGal/day	million gallons per day
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers or less
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	oxides of sulfur
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-020208

Permittee: University of Idaho	Project No. 057-00025	Date Issued: July 28, 2003
Location: Moscow, Idaho		Date Expires: November 18, 2007

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the State Implementation Plan (SIP) control strategy and the *Rules for the Control of Air Pollution in Idaho*.

Regulated Sources

Table 1.1 lists the regulated sources in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Sections	Source Description	Emissions Control
2	<u>Facility-wide fugitive dust emissions sources:</u> - Wood-waste boiler ash handling - Wood-waste fuel truck dump - Paved roads and parking lots - Unpaved roads and parking lots	Fugitive emissions – reasonable control of fugitive emissions
3	<u>Wood-waste-fired boiler:</u> S-B00 - Solid Fuels wood-waste-fired boiler Rated capacity - 60,000 pounds steam per hour	Multiclone unit
4	<u>Natural gas-fired boilers:</u> S-B0 - Cleaver-Brooks natural gas-fired boiler Model: DLD-76 Rated heat input capacity : 82.5 MMBtu/hr S-B4 - Combustion Engineering natural gas-fired boiler Model: NB-242 Rated heat input capacity: 42.9 MMBtu/hr	S-B0 – Uncontrolled S-B4 – Uncontrolled
5	<u>Diesel-fired electrical generators:</u> S-G01 - Kohler Model 18 NA 3160 – located at Gibb Hall S-G02 - Kohler Model 180ROZJ181 – located at Power Plant S-G03 - CAT Model 3412 – located at McClure Hall	S-G01 – Uncontrolled S-G02 – Uncontrolled S-G03 – Uncontrolled
6	<u>Insignificant activities:</u>	As applicable

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2. FACILITY-WIDE REQUIREMENTS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

Table 2.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.10, 2.11
2.5	Odors	Reasonable control	IDAPA 58.01.01.775-776	2.6, 2.10, 2.11
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.10, 2.11
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9-2.9.5, 2.10, 2.11
2.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.10, 2.11
2.13	Renovation and demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.10, 2.11
2.14	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	2.10, 2.11
2.15	Air quality standards	Test methods	IDAPA 58.01.01.157	2.10, 2.11, 2.20
2.16	Fuel-burning equipment	Grain loading	IDAPA 58.01.01.676 and 677	2.10, 2.11
2.18	Fuel sulfur content	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	2.10, 2.11, 2.19
2.20	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.10, 2.11, 2.15
2.21	Recycling and emissions reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.10, 2.11

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

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- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable, but no later than 24 hours after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable but no later than 24 hours after identification. The permittee shall maintain records of the results of each monthly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable but no later than 24 hours after the receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, but no later than 24 hours, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the

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permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94, IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, but no later than 24 hours after the event, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence, including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

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- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

2.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

2.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The records shall be made available to the Department upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00]

(State-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

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Reports and Certifications

- 2.10 All periodic reports and certifications required by this permit and General Provision 24 shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Reports, certifications, and notifications shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F St.
Lewiston, ID 83501
Tel.: (208) 769-4370
Fax: (208) 769-3451

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to the following:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 2.12 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

IDAPA 58.01.01.600-616, 5/1/94]

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Renovation / Demolition

- 2.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M, when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

Test Methods

- 2.15 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Fuel-Burning Equipment

- 2.16 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 2.17 The permittee is not required to demonstrate compliance with the PM grain-loading standards listed in IDAPA 58.01.01.676 and 677, except for emissions units with permit conditions including compliance demonstration provisions specified elsewhere in this permit.

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Sulfur Content

2.18 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight
- ASTM Grade 2 fuel oil - 0.5% by weight

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

2.19 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of distillate fuel oil received. The documentation must identify the supplier of the fuel, the date of fuel delivery, the grade of distillate fuel, and the sulfur content in percent by weight.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Compliance Testing

2.20 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit a report to the Department for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F St.
Lewiston, ID 83501
Tel.: (208) 769-4370
Fax: (208) 769-3451

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

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Recycling and Emissions Reductions

- 2.21 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

Hospital / Medical / Infectious Waste Incinerators Constructed Before June 20, 1996

- 2.22 Any co-fired combustor is not subject to IDAPA 58.01.01.862 if the permittee does the following:

- Notifies the Department of an exemption claim
- Provides an estimate of the relative amounts of hospital waste, medical/infections waste, and other fuels and wastes to be combusted
- Keeps records on a calendar-quarter basis of the weight of hospital waste, medical/infectious waste, and the weight of all other fuels and wastes combusted.

[IDAPA 58.01.01.862.02.b]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-020208**Permittee:** University of Idaho
Location: Moscow, Idaho**Project No.** 057-00025**Date Issued:** July 28, 2003**Date Expires:** November 18, 2007**3. SOLID FUELS WOOD-WASTE-FIRED BOILER (S-B00)****3.1 Boiler Process Description**

This permit condition is for information purposes only.

The primary purpose of the wood-waste-fired boiler is to produce steam for heating the campus during cold weather and to provide steam to absorption chillers to cool the campus buildings in summer. This boiler uses wood-waste as a fuel and is allowed to use confidential business paper as a fuel in an amount that is not to exceed 0.5% of the average volume of wood-waste fuel combusted at any time.

This emissions unit contains a furnace section and a boiler section. The furnace section combusts wood-waste to provide heat to the boiler section. The boiler section transfers a portion of this heat from the combustion gases to water flowing inside tubes located in the boiler section to create steam for various uses at the campus. Solid Fuels Inc. manufactured the furnace. The boiler section was manufactured by Nebraska, and is rated at 60,000 pounds of steam per hour.

3.2 Boiler Control Description

This permit condition is for information purposes only.

A multiclone controls emissions from the wood-waste-fired boiler. Emissions from the multiclone unit are then vented through a stack to the atmosphere.

Table 3.1 lists the emissions unit and emissions control device(s).

Table 3.1 EMISSION UNIT AND CONTROL DEVICES

Emission Unit	Emission Control Device
Solid Fuels wood-waste-fired boiler, Model S-B00	Multiclone

Table 3.2 contains a summary of requirements that apply to the Solid Fuels wood-waste-fired boiler.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
3.3	PM	0.08 gr/dscf at 8% oxygen by volume	Tier II Operating Permit and PTC No. 057-00025	3.14, 3.16
3.3	PM ₁₀	17.24 lb/hr, 75.52 T/yr	Tier II Operating Permit and PTC No. 057-00025	3.14, 3.16
3.3	CO	164 T/yr	Tier II Operating Permit and PTC No. 057-00025	3.16
3.3	NO _x	71.63 T/yr	Tier II Operating Permit and PTC No. 057-00025	3.16
3.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	Tier II Operating Permit and PTC No. 057-00025	3.10

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Emission Limits**3.3 Solid Fuels Wood-Waste-Fired Boiler Emission Limits**

Particulate matter emissions from the wood-waste-fired boiler stack shall not exceed 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume (IDAPA 58.01.01.676), nor shall NO_x, PM₁₀, and CO emissions exceed any corresponding emission rate limit listed in Table 3.3.

Table 3.3 SOLID FUELS WOOD-WASTE-FIRED BOILER ALLOWABLE EMISSIONS

SOURCE	PM ₁₀		CO	NO _x
	lb/hr	T/yr	T/yr	T/yr
Solid Fuels wood-waste-fired boiler (S-B00)	17.24	75.52	164	71.63

Compliance shall be demonstrated with the hourly and annual emission limits.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.4 Boiler Visible Emission Limits

Visible emissions from the wood-waste-fired boiler stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. This limitation shall apply whether only the wood-waste-fired boiler is operating, or if the wood-waste-fired boiler and the natural gas-fired boiler S-B1 are operating concurrently.

[IDAPA 58.01.01.625, 4/5/00]

OPERATING REQUIREMENTS**3.5 Boiler Operation Limit**

- 3.5.1 The maximum steam production rate of the wood-waste-fired boiler shall not exceed an average of 52,300 pounds of steam per hour, based upon a three-hour rolling average.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 3.5.2 The maximum allowable steam production rate of 52,300 pounds of steam per hour may be increased to a level that shall not exceed 120% of the average steam production rate attained during the most recent performance test approved by the Department.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

- 3.5.3 If the maximum steaming production rate of 120% of the average steam rate attained during the most recent performance test would exceed the PM grain-loading standard contained in this permit, the maximum operational steaming rate shall be limited to the steaming rate obtained by the following equation:

$$\text{Max. steam rate} = \text{Ave. steam rate during test} \times \left(\frac{0.08 \text{ gr/dscf at 8\% oxygen}}{\text{tested grain loading at 8\% oxygen}} \right)$$

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

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3.6 Multiclone Unit Operation and Maintenance Manual

The permittee shall maintain an Operations and Maintenance (O&M) manual for the multiclone unit describing the schedule and steps taken to assure the Department that the air pollution control equipment will be properly operated and maintained. The O&M manual shall address the operation, maintenance, and repair of the multiclone and shall include, at a minimum, the following:

- A general description of the multiclone control device
- Normal operating conditions, which shall include multiclone pressure drop ranges for the steam production range of the wood-waste-fired boiler
- Normal operating procedures
- Methods of preventing malfunctions
- Appropriate corrective actions to be taken in the case of upsets and malfunctions
- Provisions for weekly inspections and routine maintenance schedules

The O&M manual shall be updated periodically as additional information is gained from performance testing and day-to-day operating experience. This manual shall remain on site and shall be made available to Department representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.7 Pollution Control Equipment

Operation of the pollution control equipment (multiclone) shall be continuous at all times with the operation of the wood-waste-fired boiler.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.8 Multiclone Pressure Drop Monitoring

The permittee shall install, operate, and maintain a device to continuously monitor the pressure drop across the multiclone. The pressure drop shall be recorded once on a daily basis during operation of the wood-waste boiler. The multiclone pressure drop records shall be maintained on site for the most recent five-year period and shall be made available to Department representative upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Upon modification or renewal of this Tier I operating permit, the specific operating range developed and listed in the O&M manual pursuant to Permit Condition 3.6 shall be incorporated into the modified or renewed permit as a federally enforceable permit condition.

[IDAPA 58.01.01.322.01, 3/19/99]

3.9 Boiler Fuel Requirements

The wood-waste boiler shall only use wood fuel and is allowed to burn confidential paper-derived fuel of up to 0.5% by volume of the total volume of solid fuel material combusted in the wood-waste boiler at any time. Compliance with this limitation shall be established on a rolling 12-month basis. The boiler shall not combust any contaminated wood fuels such as railroad ties, orientated strand board, particleboard, plywood, or painted or stained woods.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

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Monitoring and Recordkeeping Requirements

3.10 Boiler Continuous Opacity Monitoring

The in-stack, continuous opacity monitoring system (COMS) shall be installed, operated, calibrated, and properly maintained on the boiler stack, in accordance with 40 CFR 60.7; 40 CFR 60.13; and 40 CFR 60, Appendix B, Specification 1, except as follows:

The COMS shall be operated in accordance with 40 CFR 60.7, except that files required by 40 CFR 60.7(f) shall be retained for at least five years following the date of measurement, maintenance, reports, or records.

Excess emissions reports shall be submitted to the Department in accordance with the provisions of IDAPA 58.01.01.130-136.

The COMS shall be operated in accordance with 40 CFR 60.13, except the opacity data reduction specified by 40 CFR 60.13(h) shall be reduced to demonstrate compliance with the visible emissions limitation specified by IDAPA 58.01.01.625.

The reduced data shall be presented numerically, and may, at the permittee's option, be presented graphically. Periods of excess emissions, as defined by IDAPA 58.01.01.006.35, which result due to startup, shutdown, and scheduled maintenance, shall be clearly identified in the reduced visible emissions documentation.

For periods where the COMS downtime exceeds 5% of the total operating time for the reporting period, the permittee shall perform a see/no see evaluation on the wood-waste boiler stack once per day during periods where the wood-waste boiler is operating and the COMS is not operational. If visible emissions are noted, the permittee shall perform a Method 9 opacity determination in accordance with the procedures outlined in IDAPA 58.01.01.625 during the same day.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.11 Boiler Steam Rate Monitoring

The permittee shall monitor and record the hourly steam production rate of the wood-waste-fired boiler which is representative of individual one-hour periods. On a monthly basis, the permittee shall calculate the average hourly steam production rate using each individual hourly steam production value on the basis of a three-hour average. The average hourly steam production values shall be used to determine compliance with the hourly steam production limitation specified in Permit Condition 3.5 and the emission limitations. This information shall be maintained on site for the most recent five-year period and shall be made available to Department representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.12 Boiler Compliance Testing

Within 12 months prior to or after the issuance date of this permit, the permittee shall conduct a compliance test on the wood-waste-fired boiler stack to demonstrate compliance with the grain-loading emission standard of 0.080 gr/dscf, corrected to 8% oxygen, as specified by IDAPA 58.01.01.677. Compliance testing shall be conducted in accordance with Permit Condition 2.20 and IDAPA 58.01.01.157.

Visible emissions shall be monitored concurrently with each compliance test run according to the provisions specified by IDAPA 58.01.01.625. The permittee may use the in-stack COMS and reduced data in lieu of EPA Reference Method 9 to establish the opacity during each test run.

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The permittee shall also monitor and record the following information during each compliance test run: the steam production, the multiclone pressure drop, and the fuel-feed rate in a manner that allows the actual hourly heat input of the fuel to be determined.

The test shall be performed while combusting wood-waste.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.13 Frequency of Compliance Testing

If the particulate grain-loading concentration measured in the compliance test is less than or equal to 75% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, no further testing is required for the five-year term of this permit. If the particulate grain-loading concentration measured during the compliance test is greater than 75%, but less than or equal to 90% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, an additional test shall be required within 36 months of the previous test date. If the particulate grain-loading concentration measured during the compliance test is greater than 90% of the particulate grain-loading standard of 0.080 gr/dscf at 8% oxygen, the permittee shall conduct an additional performance test within 12 months of the previous test date.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.14 Multiclone Pressure Drop Monitoring

The permittee shall install, operate, and maintain a device to continuously monitor the pressure drop across the multiclone. The average pressure drop shall be recorded once daily during operation of the Solid Fuels wood-waste-fired boiler. The average shall be derived from no less than 12 readings, no less than 45 minutes apart. The multiclone pressure drop records shall be maintained on site for the most recent five-year period and shall be made available to Department representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.15 Confidential Paper-Derived Fuel Monitoring

The permittee shall monitor and record the volume of confidential paper-derived fuel on the days when paper-derived fuel is combusted in the wood-waste-fired boiler. The volume of wood-waste fuel combusted in the wood-waste-fired boiler shall be monitored and recorded in the same units as the paper-derived fuel. These values shall be used to establish compliance with Permit Condition 3.9. Records of this information shall be maintained on site for the most recent five-year period and shall be made available to Department representatives upon request.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

3.16 Boiler Emission Limitation Compliance Demonstration

The permittee shall calculate hourly emissions using the emission factors in the following table on a monthly basis using the information required by Permit Condition 3.11.

Table 3.4 HOURLY AND ANNUAL EMISSIONS CALCULATIONS

Pollutant	Steam Production (lb steam/hr)	Emission Factor	Emissions
PM ₁₀		0.2395 lb PM ₁₀ / 1000 lb steam =	lbs PM ₁₀ / hr
CO		0.5200 lb CO / 1000 lb steam =	lbs CO / hr
NO _x		0.2271 lb NO _x / 1000 lb steam =	lbs NO _x / hr

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Compliance with the annual emission limitations for PM₁₀, CO, and NO_x in this permit shall be determined by summing the hourly steam production on a monthly basis and multiplying the monthly steam production by the emission factors listed in Table 3.4 above. The monthly emission rate values shall be summed for each consecutive 12-month period and shall be converted to an annual basis.

The permittee may use emission factors developed through Department-approved performance testing in place of the emission factors listed in Table 3.4, provided they are in the same units as the emission factors listed in Table 3.4 are formally approved by the Department, and changed in this permit.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Reporting Requirements

3.17 Opacity Records

The permittee shall maintain on file the continuously recorded in-stack opacity data from the wood-waste-fired boiler stack for the most recent five-year operating period and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.08, 5/1/94]

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4. NATURAL GAS-FIRED BOILERS

S-B0 - CLEAVER-BROOKS BOILER

S-B4 - COMBUSTION ENGINEERING BOILER

4.1 Process Description

This permit condition is for information purposes only.

In the event the solid fuels wood-waste-fired boiler is shut down or cannot supply the desired quantity of steam for the facility, one or more of the natural gas-fired boilers, identified as S-B0 and S-B4, is operated.

Table 4.1 lists the emissions control devices for the natural gas-fired boilers.

Table 4.1 EMISSION UNIT AND CONTROL DEVICES

Emission Unit	Emission Control Device
Cleaver-Brooks boiler, Model S-B0	None
Combustion Engineering boiler, Model S-B4	None

Table 4.2 contains a summary of requirements that apply to the natural gas-fired boilers.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
4.2	PM	0.015 gr/dscf at 3% oxygen by volume	Tier II Operating Permit and PTC No. 057-00025	4.4
4.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period.	Tier II Operating Permit and PTC No. 057-00025	4.5

Emissions Limits

4.2 Grain-Loading Standard

Particulate matter emissions from each of the natural gas-fired boiler stacks shall not exceed 0.015 gr/dscf of effluent gas adjusted to 3% oxygen by volume (IDAPA 58.01.01.676).

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

4.3 Visible Emissions Limits

Visible emissions from any natural gas-fired boiler stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

MONITORING AND RECORDKEEPING REQUIREMENTS

4.4 IDAPA 58.01.01.677 Grain-loading Standard Compliance

This permit requires no compliance demonstration for the natural gas-fired boilers designated as S-B0 or S-B4 for the purpose of establishing compliance with the grain-loading standard per IDAPA 58.01.01.677.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

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4.5 Visible Emissions Limits Compliance

No compliance demonstration is required by this permit for the natural gas-fired boilers designated as S-B0 or S-B4 for the purpose of establishing compliance with the visible emissions standard per IDAPA 58.01.01.625, except as required by Permit Condition 2.7.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

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5. DIESEL-FIRED EMERGENCY ELECTRICAL GENERATORS (S-G01, S-G02, S-G03)**5.1 Generator Process Description**

This permit condition is for information purposes only.

In the event of disruption of electricity to the facility from the power grid, one or more of the emergency electrical generator engines identified as S-G01, S-G02, and S-G03 is started and operated to provide mechanical power to the generator unit connected to each engine. Electricity is provided to sites within the facility. The generator engines are typically operated periodically for short duration for maintenance and emergency readiness purposes.

Table 5.1 lists the emissions control devices for the diesel-fired electrical generators.

Table 5.1 EMISSION UNITS AND EMISSIONS CONTROL DEVICES

Emission Unit	Emission Control Device
S-G01 Diesel-fired emergency generator	None
S-G02 Diesel-fired emergency generator	None
S-G03 Diesel-fired emergency generator	None

Table 5.2 contains a summary of requirements that apply to the diesel-fired electrical generators.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
5.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period.	Tier II Permit No. 057-00025	5.4

Emissions Limits**5.2 Generator Engines Visible Emissions Limits**

Visible emissions from any of the diesel-fired generator engine stacks shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Operating Requirements**5.3 Generator Engines Operation Limit**

Each of the diesel-fired generator engines shall operate no more than 1,800 hours in any consecutive 12-month period.

[Tier II Operating Permit and Permit to Construct No. 057-00025, 9/10/02]

Monitoring and Recordkeeping Requirement**5.4 Diesel-fired Generator Engines Parameter Monitoring**

The permittee shall monitor and record the total hours of operation for each individual generator engine listed in this permit condition on a monthly basis. The monthly operating hours for each generator engine shall be summed for each consecutive 12-month period to establish compliance with the operation limitation specified by Permit Condition 5.3.

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6. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b)(i) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Storage tanks less than 260 gallons storage capacity	1
Storage tanks containing VOC products less than 10,000 gallons storage capacity	3
Natural gas-fired emergency generators less than 5 MMBtu/hr heat input	5
Gasoline-fired emergency generator of less than 0.5 MMBtu/hr and fuel less than 1.0 weight percent sulfur	6
Biofuels test engines of less than 0.5 MMBtu/hr and fuel less than 1.0 weight percent sulfur	6
Small emergency generators	7
Printing and silk-screening activities	12
Water chlorination facilities less than 20 MMGal/day	16
Paint booths less than 2 gallons per day	17
Small boilers less than 5MMBtu/hr	18
Domestic hot water heaters less than 5 MMBtu/hr	18
Small space heating furnaces less than 5 MMBtu/hr	18
Smokehouses under 20 square feet	21
Treated wastewater effluent chlorination facility less than 1 MMGal/day	28
Incinerators	30
Indoor firing range	30
Gas storage area and gas cabinets	30
Indoor swimming pool	30
Space heating boiler – Holm Research Center	30
Space heating boiler – Dairy milk parlor/barn	30
Space heating boiler – Martin Lab	30
Space heating boiler - Aquaculture Institute	30
Space heating boiler – Kibbie Dome	30
Space heating boiler – President's residence	30
Space heating boiler – Kibbie east end addition	30
Space heating boiler – Dairy milk parlor /barn	30
Space heating boiler – Campus police station	30
Space heating boiler – Targhee Hall	30
Space heating furnace – Holm Research Center – 3	30
Space heating furnace - Holm Research Canter – 4	30
Space heating furnace – Yard 1 storage	30

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Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(1) Citation
Space heating furnace – U of I Foundation Office	30
Space heating furnace – Meat lab/pavilion – 2	30
Space heating furnace – Targhee Hall	30
Space heating furnace – Business tech incubator	30
Space heating furnace – North Campus Center – 4	30
Space heating furnace – Human Resources	30
Space heating furnace – Industrial Education – 2	30
Space heating furnace – North Campus Center – 1	30
Space heating furnace – Motor pool/garage – 2	30
Space heating furnace – Industrial Education – 7	30
Space heating furnace – Golf course club house	30
Space heating furnace – Meat lab/pavilion – 1	30
Space heating furnace – Industrial Education – 5	30
Space heating furnace – North Campus Center – 3	30
Space heating furnace – Golf course club house	30
Space heating furnace – Industrial Education – 4	30
Space heating furnace – Ag publications	30
Space heating furnace – Motor pool/garage – 3	30
Space heating furnace – Ag Engineering Office	30
Space heating furnace – Bookstore – 3	30
Space heating furnace – Aquaculture Lab – 2	30
Space heating furnace – Hemo-Parasitic barn	30
Space heating furnace – North Campus Center – 3	30
Space heating furnace – Motor pool/garage – 4 (8 Units)	30
Space heating furnace – Sheep house	30
Space heating furnace – Family housing – 2 (7 Units)	30
Space heating furnace – Business Tech incubator	30
Space heating furnace – Industrial Education – 3	30
Space heating furnace – Bookstore – 2	30
Space heating furnace – North Campus Center – 5	30
Space heating furnace – Family housing – 3	30
Space heating furnace – Dairy house	30
Space heating furnace – Beef house	30
Space heating furnace – Business Tech incubator (9 Units)	30
Space heating furnace – Bookstore – 1	30
Space heating furnace – Family housing group (108 Units)	30
Space heating furnace – Motor pool/garage – 1	30

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Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(1) Citation
Space heating furnace – Domestic water system pump house	30
Space heating furnace – Aquaculture Lab – 1	30
Space heating furnace – Industrial Education –1	30
Water heater - Kibbie east end addition	30
Water heater - Holm Research	30
Water heater - Meats Lab – 1	30
Water heater - Meats Lab – 2	30
Water heater – Targhee Hall	30
Water heater – Martin Lab	30
Water heater – Dairy milking parlor	30
Water heater – President's residence	30
Water heater – Family housing (108 Units)	30
Incinerator burners – Life Science North	30
Incinerator burners – Holm Research	30
Emergency generator – College of Forestry	30
Emergency generator – Library	30
Emergency generator – Kibbie Dome	30
Emergency generator – Theophilus Tower	30
Emergency generator – Administration	30
Emergency generator – McConnell Hall	30
Emergency generator – Student Union Building	30
Emergency generator – Engineering/Physics	30
Biofuels test engines – Engineering Isotopes Lab (3 Engines)	30

- 6.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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7. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
8. The permittee shall furnish copies of records required to be kept by this permit upon request by the Department. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

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Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99;
40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Permit Condition 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Permit Condition 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) charges are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94;
40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.
13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act, or under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:
- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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- d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.399.
[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.
[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]
- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.
[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

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- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Permit Condition 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Permit Condition 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.
[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99;
40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

- 21. a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and EPA as follows:
- b. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the November 18, 2002 permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
- c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

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- d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Permit Condition 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as the Department may require to determine the compliance status of the source.
- e. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the November 18, 2002 permit issuance date. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(III)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "Emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]

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Appendix

AIR EMISSIONS INVENTORY

The following tables represent the potential to emit for criteria air pollutants for the University of Idaho facility. The tables are for informational purposes only.

SIGNIFICANT SOURCES	PM		PM ₁₀		SO ₂		CO		NO _x		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Solid Fuels wood-waste fired boiler (S-B00)	13.79	60.42	17.24	75.52	0.82	3.58	37.44	163.99	16.35	71.63	2.40	10.51
Cleaver-Brooks natural gas-fired boiler (S-B0)	0.61	2.69	0.61	2.69	0.05	0.22	6.79	29.8	8.09	35.43	0.44	1.95
Combustion Engineering natural gas-fired boiler (S-B4)	0.32	1.40	0.32	1.40	0.03	0.13	3.53	15.5	4.21	18.42	0.23	1.01
Electrical generator engine SG-01, Gibb Hall	1.15	1.03	1.15	1.03	1.07	0.97	3.52	3.16	16.32	14.69	1.33	1.20
Electrical generator engine SG-02, Power Plant	1.02	0.92	1.02	0.92	0.96	0.86	3.14	2.82	14.55	13.10	1.19	1.07
Electrical generator Engine SG-03, McClure Hall	1.46	1.31	1.46	1.31	1.36	1.23	4.47	4.02	20.73	18.66	1.69	1.52
Total	18.94	67.86	22.39	82.87	4.34	6.99	65.36	219.49	87.96	171.93	7.70	17.26

EMISSION TOTALS FOR OTHER SOURCES (T/yr)

NO _x	SO ₂	PM/PM ₁₀	CO	VOC
21.59	0.17	1.38	11.78	2.49

FACILITY-WIDE ANNUAL POTENTIAL EMISSIONS SUMMARY (T/yr)

PM	PM ₁₀	SO ₂	CO	NO _x	VOC
69.24	84.25	7.16	231.27	193.52	19.85

[Tier II Permit No. 057-00025, 9/10/02]